

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MASTERFILE CORPORATION,
Plaintiff

vs.

ERIK SCOTT AND KATY SCOTT
Defendants

§
§
§
§
§
§
§
§

C.A. NO. 4:14-cv-1882

DEMAND FOR JURY TRIAL

COMPLAINT

PLAINTIFF, MASTERFILE CORPORATION, through its attorneys, brings this complaint for copyright infringement and alleges as follows:

PARTIES

1. PLAINTIFF, MASTERFILE CORPORATION ("Masterfile"), is a Canadian corporation with its principal place of business 3 Concorde Gate, Fourth Floor, Toronto, Ontario, Canada M3C 3N7. Masterfile is a stock image licensing agency in the business of licensing reproduction and display rights in images to users for a fee.
2. On information and belief, DEFENDANT ERIK SCOTT ("Erik Scott") is an individual who owns and does business as Scott Property Group as a real estate agent. At all times relevant to the allegations in this Complaint, Erik Scott maintained a place of business at 1251 Barron Road, College Station, Texas 77845.
3. On information and belief, DEFENDANT KATY SCOTT ("Katy Scott") is an

individual who does business with Scott Property Group as a real estate agent. At all times relevant to the allegations in this Complaint, Katy Scott maintained a place of business at 1251 Barron Road, College Station, Texas 77845.

JURISDICTION AND VENUE

4. This action arises under the Federal Copyright Act of 1976, as amended, 17 U.S.C. §§ 101, *et seq.* Jurisdiction is founded on 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over Erik Scott and Katy Scott (collectively, "Defendants") by virtue of their presence in this District, as well as their transacting, doing, and soliciting business in this District.

6. Venue is proper under 28 U.S.C. §§ 1391(b)(1) and 1400(a).

FACTS COMMON TO ALL CAUSES OF ACTION

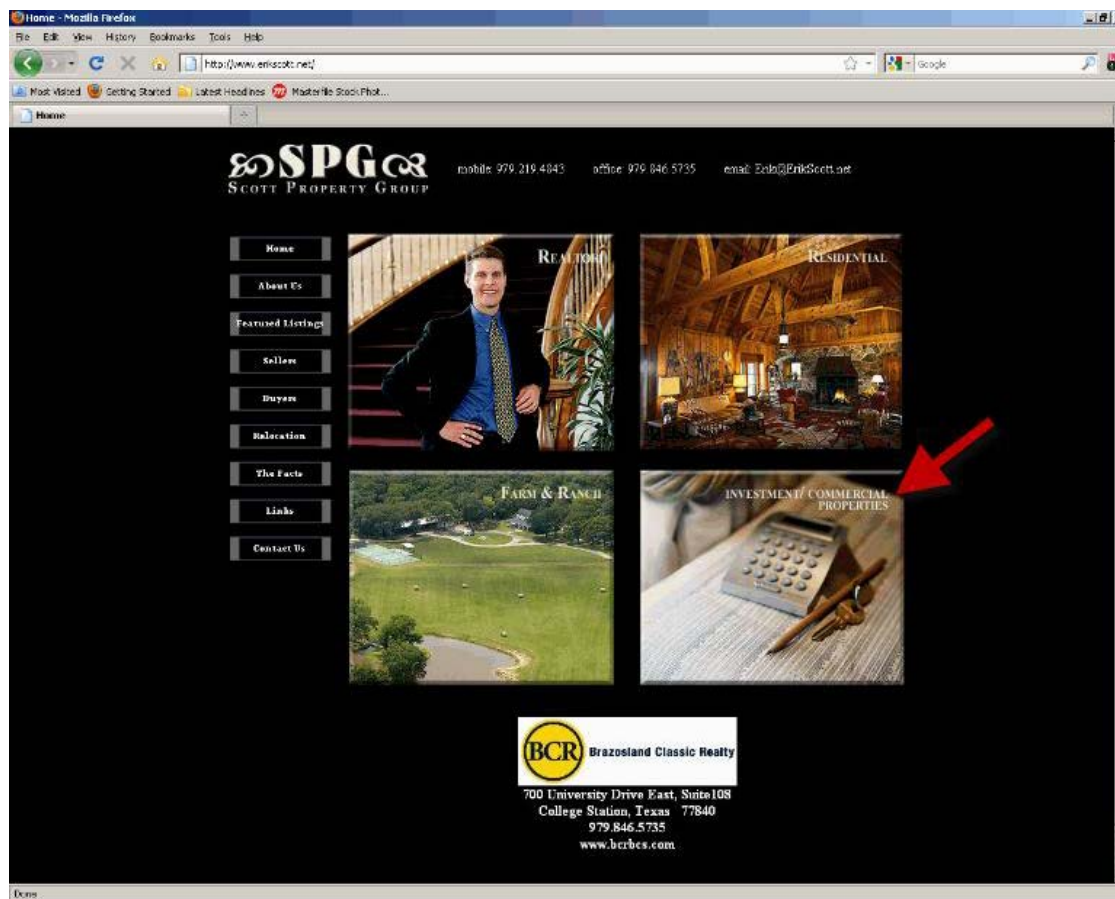
7. In 2002, Masterfile obtained the exclusive assignment of the copyright in one (1) image identified by Masterfile as Image No. 700-00087799 (the "Image"), as shown below:



8. Masterfile has complied in all respects with the Copyright Act of 1976, 17 U.S.C. § 101, *et seq.*, as amended, and all other laws and regulations governing

copyrights and has secured the exclusive rights and privileges in and to the copyright for the Image. The Register of Copyrights for the U.S. Copyright Office issued Masterfile a Certificate of Registration for the copyright to the Image, number VA 1-166-519, effective September 20, 2002, attached as Exhibit A.

9. In or about March 2012, Masterfile became aware that Defendants were reproducing and displaying the Image on a website with the URL, www.erikscott.net (the "Website"), as shown below and indicated by the red arrow:



10. Upon information and belief, the Defendants control, own, and operate the Website, through which they advertise their services and solicit customers.

11. On or about March 29, 2012, Masterfile provided notice via overnight courier to Defendants that the Image appeared on the Website without authorization of Masterfile or the law.

12. Defendants failed to remove the Image from the Website and refused to pay retroactive license fees to Masterfile for the unauthorized use of the Image on the Website.

13. On or about August 13, 2012, and again on or about October 25, 2012, Masterfile sent Digital Millennium Copyright Act ("DMCA") takedown notices to Yahoo!, the Internet Service Provider for the Website, requesting that the Image be removed from the Website.

14. On October 31, 2012, Yahoo! confirmed that it had removed the Image from the Website.

15. Sometime after October 31, 2012, and before or on May 30, 2013, Defendants reposted the Image on the Website in the same location as shown above.

16. On or about August 20, 2013, Masterfile sent another notice to Yahoo!, the Internet Service Provider for the Website, requesting that the Image be removed from the Website.

17. Thereafter, also on or about August 20, 2013, Masterfile received email correspondence from Katy Scott that Yahoo! had suspended the Website. Nevertheless, Defendants refused to pay Masterfile license fees for their use of the Image.

18. Defendants are not, and have never been, licensed or authorized to reproduce or display the Image on the Website or to create derivative work based on the Image.

19. The Image is an original work of authorship fixed in a tangible medium of expression from which it can be perceived, reproduced, or otherwise communicated, either directly or with the aid of a machine or device, and as such is protected by copyright.

20. At all times relevant to this action, Masterfile was the sole and exclusive owner of all right, title, and interest in and to the copyright in the Image.

**FIRST CLAIM FOR RELIEF
COPYRIGHT INFRINGEMENT**

21. Masterfile re-alleges and incorporates by reference paragraphs 1 through 20 above.

22. On information and belief, Defendants had access to the Image through the Internet.

23. Defendants' reproduction, display, distribution, and creation of derivative work of the Image are substantially similar to the Image.

24. Defendants have not compensated Masterfile for their reproduction, display, distribution, and creation of derivative work of the Image.

25. Without Masterfile's authorization, Defendants reproduced and publicly displayed Masterfile's copyrightable work and created and publicly displayed a derivative work based on Masterfile's copyrightable work in violation of 17 U.S.C. § 501.

26. Defendants' conduct violates the exclusive rights belonging to Masterfile

as owner of the copyright for the Image, including without limitation, Masterfile's exclusive rights under 17 U.S.C. § 106.

27. As Masterfile first discovered Defendants' reproduction, display, distribution, and creation of derivative work of the Image in or around March 2012, Masterfile's claims are within the three-year statute of limitations period pursuant to 17 U.S.C. § 507(b).

28. As a direct and proximate result of its wrongful conduct, Defendants have realized and continue to realize profits and other benefits rightfully belonging to Masterfile for the Image. Accordingly, Masterfile seeks an award of actual damages and profits against Defendants plus attorneys' fees and costs pursuant to 17 U.S.C. §§ 504(b) and 505.

29. In the alternative, Masterfile is entitled to and seeks statutory damages against Defendants for their wrongful conduct, including attorneys' fees and costs pursuant to 17 U.S.C. §§ 504(c)(1) and 505.

30. Defendants' infringement of the Image was willful and performed with knowledge that the reproduction, display, and distribution of the Image were unauthorized; Masterfile is therefore entitled to the recovery of enhanced statutory damages pursuant to U.S.C. § 504(c)(2).

SECOND CLAIM FOR RELIEF DECLARATORY JUDGMENT

31. Masterfile adopts and incorporates paragraphs 1 through 20 above.

32. An actual controversy has arisen between Masterfile and Defendants. Masterfile desires a judicial determination that: (1) Masterfile owns all rights, title and interest in the Image; (2) that Defendants had no license or permission to

reproduce, display, distribute or create a derivative work of the Image; (3) that Defendants infringed Masterfile's copyright when Defendants reproduced, displayed, distributed and created a derivative work of the Image on the Website; (4) that Defendants willfully infringed Masterfile's copyright by continuing to reproduce, display, distribute or create a derivative work of the Image on the Website despite notice to cease the use; and (5) that Defendants has no present or future rights to reproduce, display, distribute, or create a derivative work of the Image.

**THIRD CLAIM FOR RELIEF
ATTORNEYS' FEES AND COSTS**

33. Plaintiff adopts and incorporates paragraphs 1 through 20 above.

34. Due to the unlawful actions by Defendants , it has become necessary for Masterfile to retain the services of the undersigned Texas attorney to prosecute its claims. Masterfile is entitled to payment of its reasonable and necessary attorneys fees and costs from Defendants.

PRAYER

PLAINTIFF PRAYS THAT THIS HONORABLE COURT:

35. Order that Defendants' unauthorized conduct violates Masterfile's rights under the Federal Copyright Act at 17 U.S.C. §101, et seq.;

36. Order Defendants to account to Masterfile for all gains, profits, and advantages derived by Defendants from the unauthorized uses of the Image;

37. Award Masterfile all profits and damages against Defendants in such amount as may be found pursuant to 17 U.S.C. § 504(b) (with interest thereon at the highest legal rate) for the Defendants' unauthorized display, distribution, and

creation of derivative work of Masterfile' copyright in the Image; alternatively, maximum statutory damages against Defendants in the amount of \$30,000 for the infringement pursuant to 17 U.S.C. § 504(c)(1); or such other amount as may be proper pursuant to 17 U.S.C. § 504;

38. Alternatively, award Masterfile maximum statutory damages against Defendants in the amount of \$150,000 for each unauthorized violation of 17 U.S.C. § 106 pursuant to 17 U.S.C. § 504(c)(2); or such other amount as may be proper pursuant to 17 U.S.C. § 504;

39. Award Masterfile its costs of litigation, reasonable attorneys' fees and disbursements in this action against Defendants pursuant to 17 U.S.C. § 505;

40. Enter preliminary and permanent injunctions providing that Defendants shall deliver to Masterfile all copies of the infringing work and all other materials containing such infringing copies in the Defendants' possession, custody, or control, for destruction;

41. Enter preliminary and permanent injunctions providing that Defendants shall deliver to Masterfile accountings identifying each recipient of any infringing works;

42. Enter preliminary and permanent injunctions enjoining Defendants from engaging in any further acts of copyright infringement of Masterfile's Image; and

43. For such other and further relief as this Honorable Court deems just and proper.

Masterfile further prays that, on final trial, the Court award to Masterfile all elements of damage set forth herein against Defendants for Plaintiff's damages,

attorneys' fees and costs, interest, court costs, and to enjoin Defendants from further use of Masterfile's Image, that this matter go hence without delay, and for such other and further relief, both special and general, at law and in equity, to which the Plaintiff may show to be justly entitled.

JURY DEMAND

Masterfile respectfully requests that when this case proceeds to trial, it be placed on the Court's jury trial docket.

Respectfully submitted,

The Pam Rea Law Firm, PLLC

/s/ Pam Rea

Pam Rea
Texas Bar No. 00792790
Federal Id. No. 20799
6100 Chapman St.
Houston, Texas 77022
(832) 286-8142
(713) 782-5002 – Facsimile
Email: pamrea@pamrealaw.com

**Attorney in Charge
for Masterfile Corporation**

EXHIBIT A

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters
 REGISTER OF COPYRIGHTS
 United States of America

FORM VA

For a Work of the Visual Arts
UNITED STATES COPYRIGHT OFFICE

VA 1-166-519



EFFECTIVE DATE OF REGISTRATION

SEPT 20 2002
 Month Day Year

OFFICIAL SEAL

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK ▼

Group Registration for Automated Database
 entitled www.masterfile.com

NATURE OF THIS WORK ▼ See instructions
 Updates from July 19, 2002 to
 September 19, 2002

PREVIOUS OR ALTERNATIVE TITLES ▼

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

Representative publication date: September 19, 2002 (bi-monthly revisions)
 If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

NAME OF AUTHOR ▼

a Masterfile Corporation

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?

☒ Yes
☐ No

Author's Nationality or Domicile

 OR
 Name of Country
 Citizen of
 Domiciled in

Was This Author's Contribution to the Work

 Anonymous? ☐ Yes ☐ No
 Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

☐ 3-Dimensional sculpture ☐ Map ☐ Technical drawing
☐ 2-Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

Revised compilation of photographs and 2-dimensional art

NAME OF AUTHOR ▼

b See 3 continuation sheets attached

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?

☐ Yes
☐ No

Author's Nationality or Domicile

 OR
 Name of Country
 Citizen of
 Domiciled in

Was This Author's Contribution to the Work

 Anonymous? ☐ Yes ☐ No
 Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

☐ 3-Dimensional sculpture ☐ Map ☐ Technical drawing
☐ 2-Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

2
 NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

3
 4

See instructions before completing this space.

Year in Which Creation of This Work Was Completed

 This information must be given in all cases.
 2002 Year

Date and Nation of First Publication of This Particular Work

 Complete this information ONLY if this work has been published.
 Month Sept. Day 19 Year 2002

Canada & USA

Nation

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

Masterfile Corporation
 175 Bloor Street East, South Tower, Second Floor
 Toronto, Ontario, Canada M4W 3R8

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

copyright assigned contractually

MORE ON BACK

• Complete all applicable spaces (numbers 5-8) on the reverse side of this page.
 • See detailed instructions.
 • Sign the form at line 8.

DO NOT WRITE HERE

APPLICATION RECEIVED

SEP 20 2002

ONE DEPOSIT RECEIVED

SEP 20 2002

TWO DEPOSITS RECEIVED

SEP 20 2002

FUNDS RECEIVED

SEP 20 2002

EXAMINED BY Vg FORM VA

CHECKED BY

☐ CORRESPONDENCE
YesFOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☒ Yes ☐ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.)a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author as copyright claimant.c. ☒ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number

VA 1-108-991

Year of Registration 2001

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.

Previously registered database

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

Revised compilation updated bi-monthly
New photographs and new 2-dimensional art

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name

Account Number

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP

Kathy Burgess, Masterfile Corporation
175 Bloor Street East, South Tower, Second Floor
Toronto, Ontario, Canada M4W 3R8

Area code and daytime telephone number (416) 929-3000

Fax number 416 929-9623

Email kburgess@masterfile.com

CERTIFICATION* I, the undersigned, hereby certify that I am the

check only one

- ☐
- author
-
- ☐
- other copyright claimant
-
- ☒
- owner of exclusive right(s)
-
- ☐
- authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s) of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date If this application gives a date of publication in space 3, do not sign and submit it before that date.

Masterfile Corporation / Kathy Burgess, Corporate Secretary Date Sept. 19, 2002

Handwritten signature (X)

Certificate
will be
mailed in
window
envelopeto
this
address:

Name

Masterfile Corporation

Number/Street/Apt

175 Bloor Street East, South Tower, Second Floor

City/State/ZIP

Toronto, Ontario, Canada M4W 3R8

YOU MUST:

- Complete all necessary spaces
-
- Sign your application in space 8

SEND ALL 3 ELEMENTS
IN THE SAME PACKAGE

1. Application form
-
2. Nonrefundable filing fee in check or money As of July 1, 1999
-
- the filing fee is
-
3. Deposit material order payable to: Registrar of Copyrights
-
- Form VA is \$30.

MAIL TO:

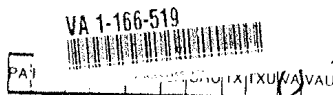
Library of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20540-6000

*17 U.S.C. § 506(a): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

CONTINUATION SHEET FOR APPLICATION FORMS

- This Continuation Sheet is used in conjunction with Forms CA, PA, SE, SR, TX, and VA, only. Indicate which basic form you are continuing in the space in the upper right-hand corner.
- If at all possible, try to fit the information called for into the spaces provided on the basic form.
- If you do not have enough space for all the information you need to give on the basic form, use this Continuation Sheet and submit it with the basic form.
- If you submit this Continuation Sheet, clip (do not tape or staple) it to the basic form and fold the two together before submitting them.
- Space A of this sheet is intended to identify the basic application.
Space B is a continuation of Space 2 on the basic application. Space B is not applicable to Short forms.
- Space C (on the reverse side of this sheet) is for the continuation of Spaces 1, 4, or 6 on the basic application or for the continuation of Space 1 on any of the three Short Forms PA, TX, or VA.

FORM VA /CON
UNITED STATES COPYRIGHT OFFICE
REGISTRATION NUMBER



EFFECTIVE DATE OF REGISTRATION

SEPT 20 2002
(Month) (Day) (Year)

CONTINUATION SHEET RECEIVED

SEP 20 2002

Page 3 of 8 pages

DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY

IDENTIFICATION OF CONTINUATION SHEET: This sheet is a continuation of the application for copyright registration on the basic form submitted for the following work:

- TITLE: (Give the title as given under the heading "Title of this Work" in Space 1 of the basic form.)

A
Identification
of
Application

Group Registration for Automated Database entitled www.masterfile.com

- NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S): (Give the name and address of at least one copyright claimant as given in Space 4 of the basic form or Space 2 of any of the Short Forms PA, TX, or VA.)

Masterfile Corporation
175 Bloor Street East, South Tower, Second Floor, Toronto, Ontario, Canada M4W3R8

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

B
Continuation
of Space 2

Was this contribution to the work a "work made for hire"?
Name of Country

☐ Yes
☐ No

OR { Citizen of _____
Domiciled in _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

e

Was this contribution to the work a "work made for hire"?
Name of Country

☐ Yes
☐ No

OR { Citizen of _____
Domiciled in _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

f

Was this contribution to the work a "work made for hire"?
Name of Country

☐ Yes
☐ No

OR { Citizen of _____
Domiciled in _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

Use the reverse side of this sheet if you need more space for continuation of Spaces 1, 4, or 6 of the basic form or for the continuation of Space 1 on any of the Short Forms PA, TX, or VA.

CONTINUATION OF (Check which): ☐ Space 1 ☐ Space 4 ☐ Space 6 (Space 2) Page 1 of 3 pages
 Image range: 700-087051 to 700-093785

CContinuation
of other
Spaces

NATURE OF AUTHORSHIP

Author		2-Dimensional Artwork	Photograph	Work made for hire
Alberstat	Michael		X	No
Anderson	Bob	X	X	No
X Andrews	J. David		X	No
Apkarian	Puzant		X	No
Arsenault	Pierre		X	No
Bailey	Janet		X	No
Barker	Keate	X	X	No
Barrett	Peter	X	X	No
Benard	Joel		X	No
Benson	Daryl	X	X	No
Birnback	Allen		X	No
Black	Garry	X	X	No
Boden/Ledingham	Rick&Marilyn	X	X	No
Bruel	Jean-Yves	X	X	No
Burazin	Tom & Becky	X	X	No
Christopher	Peter	X	X	No
Collicott	Tom	X	X	No
Contorakes	George	X	X	No
Craft	Steve		X	No
Davey	Allan	X		No
Davies	Ken	X	X	No
Dazzo	Jason		X	No
DesRochers	Simon	X	X	No
Dobel	Mike	X	X	No
Dodge	Kevin		X	No
Edelsten	Owen	X	X	No
Eekhoff	Paul	X	X	No
Ertman	Miles	X	X	No
Fehling	Ron		X	No
Feiler	Tom		X	No
Findlay	Susan		X	No
Finlay	Kathleen		X	No
Fischer	Rick	X		No
Foster	Janet		X	No
Foster	John		X	No
Fleming	Bruce		X	No
French	Graham	X	X	No

Certificate
will be
mailed in
window
envelope
to this
address:

Name ▼
Masterfile Corporation
Number/Street/Apt ▼
175 Bloor Street East, South Tower, Second Floor
City/State/ZIP ▼
Toronto, Ontario, Canada M4W 3R8

YOU MUST:
• Complete all necessary spaces
• Sign your application

**SEND ALL 3 ELEMENTS
IN THE SAME PACKAGE:**

1. Application form
2. Nonrefundable fee in check or
money order payable to *Register
of Copyrights*

MAIL TO:
Library of Congress, Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20540-8000

D

Fees are effective
through June 30,
2002. After that date,
check the Copyright
Office Website at
www.loc.gov/copy
right or call (202)
707-9000 for current
fee information.

June 1999-20,000
WED REV: June 1999

PRINTED ON RECYCLED PAPER

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

CONTINUATION SHEET FOR APPLICATION FORMS

- This Continuation Sheet is used in conjunction with Forms CA, PA, SE, SR, TX, and VA, only. Indicate which basic form you are continuing in the space in the upper right-hand corner.
- If at all possible, try to fit the information called for into the spaces provided on the basic form.
- If you do not have enough space for all the information you need to give on the basic form, use this Continuation Sheet and submit it with the basic form.
- If you submit this Continuation Sheet, clip (do not tape or staple) it to the basic form and fold the two together before submitting them.
- Space A of this sheet is intended to identify the basic application.
- Space B is a continuation of Space 2 on the basic application. Space B is not applicable to Short forms.
- Space C (on the reverse side of this sheet) is for the continuation of Spaces 1, 4, or 6 on the basic application or for the continuation of Space 1 on any of the three Short Forms PA, TX, or VA.

FORM VA /CON
UNITED STATES COPYRIGHT OFFICE

REGISTRATION

VA 1-166-519



VA 1-166-519

EFFECTIVE DATE OF REGISTRATION

SEPT 20 2002
(Month) (Day) (Year)

CONTINUATION SHEET RECEIVED

SEP 20, 2002

Page 5 of 8 pages

DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY

IDENTIFICATION OF CONTINUATION SHEET: This sheet is a continuation of the application for copyright registration on the basic form submitted for the following work:

- TITLE: (Give the title as given under the heading "Title of this Work" in Space 1 of the basic form.)

A
Identification
of
Application

Group Registration for Automated Database entitled www.masterfile.com

- NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S): (Give the name and address of at least one copyright claimant as given in Space 4 of the basic form or Space 2 of any of the Short Forms PA, TX, or VA.)

Masterfile Corporation
175 Bloor Street East, South Tower, Second Floor, Toronto, Ontario, Canada M4W3R8

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

B
Continuation
of Space 2

Was this contribution to the work AUTHOR'S NATIONALITY OR DOMICILE
a "work made for hire"? Name of Country

☐ Yes
☐ No

OR { Citizen of _____
Domiciled in _____

WAS THIS AUTHOR'S CONTRIBUTION TO
THE WORK

Anonymous? ☐ Yes ☐ No If the answer to either
of these questions is
"Yes," see detailed
instructions.
Pseudonymous? ☐ Yes ☐ No

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

e

Was this contribution to the work AUTHOR'S NATIONALITY OR DOMICILE
a "work made for hire"? Name of Country

☐ Yes
☐ No

OR { Citizen of _____
Domiciled in _____

WAS THIS AUTHOR'S CONTRIBUTION TO
THE WORK

Anonymous? ☐ Yes ☐ No If the answer to either
of these questions is
"Yes," see detailed
instructions.
Pseudonymous? ☐ Yes ☐ No

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

f

Was this contribution to the work AUTHOR'S NATIONALITY OR DOMICILE
a "work made for hire"? Name of Country

☐ Yes
☐ No

OR { Citizen of _____
Domiciled in _____

WAS THIS AUTHOR'S CONTRIBUTION TO
THE WORK

Anonymous? ☐ Yes ☐ No If the answer to either
of these questions is
"Yes," see detailed
instructions.
Pseudonymous? ☐ Yes ☐ No

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

Use the reverse side of this sheet if you need more space for continuation of Spaces 1, 4, or 6 of the basic form or for the

CONTINUATION OF (Check which): ☐ Space 1 ☐ Space 4 ☐ Space 6 (Space 2) Page 2 of 3 pages
 Image range: 700-087051 to 700-093785

C

Continuation
of other
Spaces

NATURE OF AUTHORSHIP

Author		2-Dimensional Artwork	Photograph	Work made for hire
Frkovic	Damir	X	X	No
Frymire	Bill	X	X	No
Gelberg	Bob		X	No
Gifford	Ed		X	No
Gilchrist	Scott	X	X	No
Good	Nora	X	X	No
Green Project			X	Yes
Grenier	Guy	X	X	No
Griffith	Peter		X	No
Hall	David P.		X	No
Hursey	Dana	X	X	No
Johnston	Chad		X	No
Judd	Andrew	X		No
Karageorge	Jim		X	No
Karpa	Robert	X	X	No
Klemm	Horst		X	No
Knox	Elizabeth	X	X	No
Kolb	Andrew	X	X	No
Kraulis	J.A.	X	X	No
Kuhlmann	Brian	X	X	No
Lavery	Peter		X	No
Lecorre	Darrell		X	No
Lee	John		X	No
Lim	Dan	X	X	No
Lincks	Randy		X	No
Lloyd	R. Ian		X	No
Mahovlich	Michael	X	X	No
Martin	Alison Barnes		X	No
Maude	Jeremy		X	No
McElcheran	Chris	X	X	No
McKim	Andrew	X	X	No
Mendelsohn	David	X	X	No
Minsart	Raoul		X	No
Mooney	Gail	X	X	No
Muir	David	X	X	No
Neale	Keith	X	X	No

Certificate
will be
mailed in
window
envelope
to this
address:

Name ▼

Masterfile Corporation

Number/Street/Apt ▼

175 Bloor Street East, South Tower, Second Floor

City/State/ZIP ▼

Toronto, Ontario, Canada M4W 3R8

YOU MUST:

- Complete all necessary spaces
- Sign your application

SEND ALL ELEMENTS
IN THE SAME PACKAGE

1. Application form
2. Nonrefundable fee in check or money order payable to Register of Copyrights

MAIL TO

Library of Congress, Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20559-6000

D

Fees are effective
through June 30,
2002. After that date,
check the Copyright
office Website at
[www.loc.gov/copy-
right](http://www.loc.gov/copy-
right) or call (202)
707-5900 for current
fee information.

June 1999-20,000

PRINTED ON RECYCLED PAPER

CONTINUATION SHEET FOR APPLICATION FORMS

FORM VA /CON
UNITED STATES COPYRIGHT OFFICE
REGISTRATION NUMBER

- This Continuation Sheet is used in conjunction with Forms CA, PA, SE, SR, TX, and VA, only. Indicate which basic form you are continuing in the space in the upper right-hand corner.
- If at all possible, try to fit the information called for into the spaces provided on the basic form.
- If you do not have enough space for all the information you need to give on the basic form, use this Continuation Sheet and submit it with the basic form.
- If you submit this Continuation Sheet, clip (do not tape or staple) it to the basic form and fold the two together before submitting them.
- **Space A of this sheet is intended to identify the basic application.**
Space B is a continuation of Space 2 on the basic application. Space B is not applicable to Short forms.
- Space C (on the reverse side of this sheet) is for the continuation of Spaces 1, 4, or 5 on the basic application or for the continuation of Space 1 on any of the three Short Forms PA, TX, or VA.

VA 1-166-519
[PA] [J]
EFFECTIVE DATE OF REGISTRATION

SEPT 20 2002
(Month) (Day) (Year)

CONTINUATION SHEET RECEIVED
SEP 20 2002

Page 7 of 8 pages

DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY

IDENTIFICATION OF CONTINUATION SHEET: This sheet is a continuation of the application for copyright registration on the basic form submitted for the following work:

- **TITLE:** (Give the title as given under the heading "Title of this Work" in Space 1 of the basic form.)

A
Identification
of
Application

Group Registration for Automated Database entitled www.masterfile.com

- **NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S):** (Give the name and address of at least one copyright claimant as given in Space 4 of the basic form or Space 2 of any of the Short Forms PA, TX, or VA.)

Masterfile Corporation
175 Bloor Street East, South Tower, Second Floor, Toronto, Ontario, Canada M4W3R8

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

B
Continuation
of Space 2

Was this contribution to the work **AUTHOR'S NATIONALITY OR DOMICILE**
a "work made for hire"? Name of Country

☐ Yes
☐ No

OR { Citizen of _____
Domiciled in _____

WAS THIS AUTHOR'S CONTRIBUTION TO
THE WORK

Anonymous? ☐ Yes ☐ No

Pseudonymous? ☐ Yes ☐ No

If the answer to either
of these questions is
"Yes," see detailed
instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

e

Was this contribution to the work **AUTHOR'S NATIONALITY OR DOMICILE**
a "work made for hire"? Name of Country

☐ Yes
☐ No

OR { Citizen of _____
Domiciled in _____

WAS THIS AUTHOR'S CONTRIBUTION TO
THE WORK

Anonymous? ☐ Yes ☐ No

Pseudonymous? ☐ Yes ☐ No

If the answer to either
of these questions is
"Yes," see detailed
instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

f

Was this contribution to the work **AUTHOR'S NATIONALITY OR DOMICILE**
a "work made for hire"? Name of Country

☐ Yes
☐ No

OR { Citizen of _____
Domiciled in _____

WAS THIS AUTHOR'S CONTRIBUTION TO
THE WORK

Anonymous? ☐ Yes ☐ No

Pseudonymous? ☐ Yes ☐ No

If the answer to either
of these questions is
"Yes," see detailed
instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

Use the reverse side of this sheet if you need more space for continuation of Spaces 1, 4, or 6 of the basic form or for the

CONTINUATION OF (Check which): ☐ Space 1 ☐ Space 4 ☐ Space 6 (Space 2) Page 3 of 3 pages
 Image range: 700-087051 to 700-093785

C

Continuation
of other
Spaces

NATURE OF AUTHORSHIP

Author		2-Dimensional Artwork	Photograph	Work made for hire
Noton	David		X	No
Normandin	Albert		X	No
Olney	Andrew	X	X	No
Ooms	Roy	X	X	No
Patterson	Freeman		X	No
Pieters	Brian	X	X	No
Pytlowany	Alec	X	X	No
Rainey	Wayne		X	No
Rhijnsburger	Gary		X	No
Robertson	Dave	X	X	No
Roman	Min		X	No
Rostron	Philip	X	X	No
Salmeron	Miguel	X	X	No
Sanders	Dale	X	X	No
Schmidt	David		X	No
Schmidt	Eric		X	No
Sidman-Moore	Randi		X	No
Simhoni	George	X	X	No
Smith	Richard		X	No
Stott	Greg	X	X	No
Stroud	Ron	X	X	No
Sutton	Lloyd	X	X	No
Tomalty	Mark	X	X	No
Tremblay	Pierre	X	X	No
TSUYOI			X	No
Tysick	Scott	X		No
Valiquet	Carl	X	X	No
Vaughn	Marc		X	No
Wardell	James	X		No
Whyllie	Karen	X	X	No
Wilson	Dale	X	X	No
Wright	Paul	X	X	No
Wroblewski	Brad		X	No
Yan	Wei	X	X	No
Young	Robert George	X	X	No

Certificate
will be
mailed in
window
envelope
to this
address:

Name ▼
Masterfile Corporation
Number/Street/Apt ▼
175 Bloor Street East, South Tower, Second Floor
City/State/ZIP ▼
Toronto, Ontario, Canada M4W 3R8

YOU MUST:

- Complete all necessary spaces
- Sign your application

SEND ALL 3 ELEMENTS
IN THE SAME PACKAGE:

1. Application form
2. Nonrefundable fee in check or money order payable to Register of Copyrights

MAIL TO

Library of Congress, Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20540-8000

D

Fees are effective through June 30, 2002. After that date, check the Copyright Office Website at www.loc.gov/copyright for the most current fee information.

June 1999-20,000

PRINTED ON RECYCLED PAPER